

Iowa Department of Education**Bureau of Nutrition and Health Services****State Review Summary Report****Brooklyn-Guernsey-Malcom Comm School District (08460000)****Review Dates: December 19, 20, 21 and 22, 2016**

Program Year: 2017
Month of Review: November
Lead Reviewer: Deb Linderblood
Org Representative(s): Billie Calderwood

Site - Level Findings: Brooklyn Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	The SFA currently charges one price for Pre K & K-6, and a separate price for 7-12. In order to have the documentation needed for her production records (Pre K and K-5, 6-8 & 9-12) the 6th graders are rung up separately and the 7-8th graders are rung separately. Thus at the end of the month the claim preparer must combine numbers from reports to come up with the numbers she needs for her claims. The SA discovered that the 6th grade breakfasts were not being captured and were not claimed in November 2016. Recommend that the SFA revise their student lunch prices so that they have one price for K-8 and one price for 9-12th graders and then have their software vendor set up their POS so that K-8 are rung up under one key and 9-12th grade are rung up under one key.	State your intentions to revise your student lunch prices so that you have one price for K-8 and one price for 9-12th graders and that you will have your software vendor set up your POS so that K-8 are rung up under one key and 9-12th grade are rung up under one key. The November claim will be adjusted by the State Agency so that the SFA receives their reimbursement for these missed meals.	
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA posts the breakfast menu but the signage does not inform students and cashiers how many items each food credits as.	Develop and attach breakfast signage for one week's worth of breakfast meals.	
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA offers breakfast cereal (1 oz. eq.) alone so does not meet the weekly grain requirements. TA provided that the SFA should menu the cereal with a slice of toast, some other grain or a meat/meat alternate.	State your intentions to menu cereal with another grain or a meat/meat alternate.	
400 - Meal Components and Quantities - Lunch	V-0400	The SFA did not have a standardized recipe for the Chicken Wraps and the Ham/Turkey Wraps.	Find and attach a standardized recipe (with the contributions listed) for Chicken Wraps and Ham/Turkey Wrap. If you are unable to locate a recipe with contributions determine the contributions and write them on the recipe or state that you will no longer serve one or both of these items and state what menu item will replace them.	
400 - Meal	V-0400	SFA was short on grain during the week in which	Complete and attach one week's worth of a lunch	

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Components and Quantities - Lunch		the menu certification worksheets were completed. Hard shell tacos (1 each) only credited as .35 of an oz. of grain.	menu template for a week of menus you plan to use in developing a cycle menu. Complete and attach one template for K-8th grade and one for 9-12th grade. Attach documentation showing that the grain component was met (copy of package showing the weight, product formulation statement, etc.) on a daily and weekly basis. Also attach the production records for this week's menus showing planned serving size for each grade group.	
500 - Offer versus Serve	V-0500	Nutrition staff have not had offer vs. serve training in school year 2016-2017.	Train nutrition staff on offer vs. serve. Attach a sign-in sheet with the name of the training, date, time, topics covered and signatures of each staff member.	
1100 - Smart Snacks in School	V-1100	The SFA did not have documentation from the nutrition calculator showing that the item was Smart Snack compliant for: dill pickles, pudding and Chex mix. G2 is being sold to middle school students and does not meet the Smart Snacks standards. This is a repeat finding. Elementary schools may sell up to 8-ounce portions, while middle and high school may sell up to 12-ounce portions of milk and juice. The standards allow "no calorie" and "lower calorie" beverage options for high school students. Since the middle school has access to the same vending machines as the middle school "no calorie" and "lower calorie" beverages are not allowed unless access can be limited to the 9-12th graders.	Attach the nutrition calculator page showing that the following products are Smart Snack compliant: dill pickles, pudding and Chex mix. If the product is not compliant state the product you will replace it with and attach the calculator page showing that the replacement product is Smart Snack compliant. State your intentions to discontinue selling G2 in the vending machine which middle school students have access to or indicate how access to G2 will be limited to 9-12th grade.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
700 - Resource Management	V-0700	The SFA does not have a policy for dealing with negative student balances in their nutrition account. Guidance was e-mailed to the Food Service Director to assist in the development of a policy.	Develop and attach a policy for dealing with negative student balances in their nutrition account.	
700 - Resource Management	V-0700	The SFA does not have debarment statements from the vendors used by nutrition services.	Obtain and attach a signed debarment statement from Martin Brothers and A & E.	
700 - Resource Management	V-0700	The SFA has not completed their Procurement Plan for school year 2016-2017.	Finish and attach your Procurement Plan for school year 2016-2017.	
800 - Civil Rights	V-0800	The two individuals who serve as the Determining Officials have not completed Civil Rights training for school year 2016-2017.	For the two Determining Officials to complete Civil Rights training. Attach a sign-in sheet with the date, time, topics covered and signatures attesting that the training was completed.	
1000 - Local School Wellness Policy	V-1000	An assessment of the implementation of the Wellness policy has not been completed.	State your plans and provide a timelines for: 1.) How you plan to make the policy available to the public 2.) When an assessment will be completed on the implementation of the Local School Wellness Policy	

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			and who will be responsible for completing the assessment 3.) How the district will make the assessment on the implementation of the Local School Wellness Policy available to the public.	
1200 - Professional Standards	V-1200	The two individuals who are Determining Officials have not started to complete their required 4 hours of training.	For the two Determining Officials to watch the Application and Direct Certification webinar and attach the training certificate once this is completed.	
1400 - Food Safety	V-1400	The SFA does not have a Standard Operating Procedure for Cleaning and Disinfecting Body Fluids.	Develop and attach a standard operating procedure for Cleaning and Disinfecting Body Fluids.	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA has not completed the USDA nonprogram revenue tool and on the Financial Report on IowaCNP there is a zero for the cost of nonprogram foods.	Complete and attach the USDA nonprogram revenue tool. Describe how you obtained the numbers used in the report. If the tool indicates that you need to bring in additional nonprogram revenue state how you will achieve this.	

Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		TA provided on completing the Procurement Plan. Assisted with determining the SFA's thresholds. Provided the Written Food Service Procurement Plan and the Code of Conduct instructions. Reviewed that the SFA needs to have a debarment statement from the vendors who are awarded bids. Explained that SFA needs to determine what they spent last year for each of their vendors so that they can then determine the purchasing method they need to use.
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	TA provided that applications need to be approved within 10 operating days from receipt date.
100 - Certification and Benefit Issuance	126 Are the correct conversion factors used when processing applications that indicate more than one income frequency? If NO, explain.	TA provided that a household's income should only be converted to annual if it is reported in more than one frequency.
1000 - Local School Wellness Policy	1000 Provide a copy or appropriate web address of the current Local School Wellness Policy.	TA provided that the SFA needs to expand their Wellness policy to have goals for nutrition education and promotion, physical education and other school-based activities that promote student wellness. Shared with SFA where to find sample Wellness policies on the DE web site. On the last day of the review the Superintendent provided the reviewer with a copy of a new Wellness Policy that the board was in the process of approving. The new policy has goals for nutrition education and promotion; physical education and other school-based activities that promote student wellness.
1000 - Local School Wellness Policy	1002 When and how does the review and update of the Local School Wellness Policy occur? Provide documentation to support the response (or appropriate web address(es)).	TA provided that the SFA needs to review/revise their Wellness policy every 3 years.
1000 - Local School Wellness Policy	1005 Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.	TA provided that the SFA needs to complete an assessment of their local Wellness Policy every 3 years. Provided the State Agency's template which can be used when completing the assessment. Informed SFA that the template is available on the DE web site. Also informed the SFA that

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		the completed assessment needs to be made available to the public.
1200 - Professional Standards	1221 a. Are there additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program?	TA provided that the two individuals who are Determining Officials need 4 hours of professional training per year, including civil rights training.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided on where to find breakfast promotional materials on the DE web site.
200 - Verification	200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).	Assisted SFA in completing their Verification Report. Revised numbers to reflect that SFA had two applications with a case number on them.
200 - Verification	202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)	TA provided that the SFA does not have to confirm every applications but may if they want to. Stressed that if only one person approves applications there should be a trained back-up person.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that if SFA selects an application with a case number on it, the first thing they should do is to enter this case number into Elookup. If found, the household is directly verified.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	TA provided that the most current nondiscrimination statements (USDA and Iowa) can be found on IowaCNP under download forms.
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	TA provided that the SFA should keep a copy of the public release that is sent to the public media.
Resource Mgt Comprehensive Review	1 Did the SFA charge at least the minimum weighted average paid lunch price at ALL sites?	The Food Service Director and the Authorized Representative are new in their positions and neither had ever completed the PLE tool. TA provided on how to complete the tool and that they should complete the optional Step 3 to determine the prices they need to charge in order for their weighted average to meet or exceed the required rounded down paid price requirement.
Resource Mgt Comprehensive Review	6 Did the SFA:	TA provided on how to complete the non-program revenue tool. Showed SFA where to find the tool on IowaCNP. Also showed SFA the Financial Report and showed them that currently on the 2014-2015 Financial report the nonprogram food cost is zero. Explained that goal is to have accurate numbers on the CAR so that the report will autofill the nonprogram revenue tool. Reviewed with SFA that they will need to determine the average cost of a meal in order to complete the revenue tool.

Site - Level Technical Assistance Brooklyn Elementary School (0409)

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	400 a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal service?	TA provided on how to use the Bread/Grain chart. Assisted Food Service Director in determining if a soft pretzel could be used on her menus and what the pretzels contributes.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	TA provided that as the menu planner, the Food Service Director should project the number of servings which will be needed for each grade group along with the serving size for each grade group. Recommended that she make serving sizes be a measurement that will result in the cook's understanding what amount is to be served and that provides good documentation as to how much each grade group is to be served. The cooks should then record the total amount prepared in measurable amounts such as each, pounds or #10 cans and the amount of each food item left over. The cooks or the Food Service Director should record the

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		actual number served per grade group, adults and a la carte.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided on completing menu templates for each week of menus that will be used in a cycle menu to assure that the SFA has all of the meal pattern components and all vegetable sub-groups.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve? If NO, explain and list the technical assistance provided.	E-mailed Food Service Director the most current Offer vs. Serve Manual to have as a reference and to use for training food service staff.
900 - SFA On Site Monitoring	901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1?	TA provided that on-site monitoring is now required at breakfast as well as lunch for 50% of the district's sites each year prior to February 1st. Informed SFA that a revised form for documenting is being developed by the State Agency and will be released in the near future.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. All applications had a received date and were signed and dated by the household member and the SFA and all but one were complete with Social Security Number's. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants and indicate specific fees. The SFA has a back-up system for benefit issuance documents and system. All applications were approved by a Determining Official and confirmed by a second individual.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria and annual civil rights training was provided and documented for food service staff and the Authorized Representative. The SFA submitted the annual Public Release to the local media. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The SFA's on-site monitoring was completed to ensure that all schools are meeting program requirements. The correct federal non-discrimination statement is provided on all material describing the program.
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, and the dishwasher. Good food safety procedures were observed. The kitchen and storage areas were orderly and clean. Opened food was labeled and dated. Food Service workers wore proper hair restraints and practiced good gloving procedures. The Food Service Director and three nutrition staff are ServSafe certified.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and 50% of the SFA's sties for breakfast prior to February 1st.
Professional Standards: The newly hired Food Service Director meets the hiring standards. She has completed 22.5 hours of professional training this school year including the Healthy Meals Workshop. The newly hired Authorized Representative has completed 9.5 hours of professional training this school year in areas relevant to her position. All nutrition staff have obtained the required training for school year 2016-2017 or are on track to complete the required training.
Reporting and Record Keeping: Reports are filed on time, and all records are maintained for at least three years plus the current year
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The Paid Lunch Equity, PLE, tool was completed and prices were increased as required. No indirect costs are charged the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities.
School Breakfast and Summer Food Service Program Outreach: School Breakfast Program outreach was sent out at the beginning of the year to inform families of the availability of the program. The breakfast menu is announced daily in the elementary and e-mails with the menu are sent to households. The SFA participates in the Summer Food Service Program and does extensive outreach to promote the program.
Smart Snacks: Students are able to purchase foods via a la carte sales and vending machines. Exempt leftover NSLP entrees are only sold the same day, or the day after, they are initially offered. Documentation was available to show that all a la carte sold to students during the meals met Smart Snack and Healthy Kids Act standards. The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was

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completed on time. The application(s) selected for verification were confirmed prior to verification. The SFA had at least one person attend training. The verification report was completed accurately and on time.

Wellness Policy: The SFA's wellness policy is in the process of being reviewed and revised. The public is made aware of the SFA's wellness policy via the district's web site. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity.

Site - Level Commendations Brooklyn Elementary School (0409)

Description
Meal Components and Quantities: The Food Service Director does a god job of menu planning. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. The menus met weekly and daily meal pattern requirements for the Pre K and K-6 students. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. A variety of entrees, fruits, and vegetables are offered throughout the month for lunch. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals. The Food Service Director completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period. Nutrient analysis was not required.
Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of November were accurate and complete for lunch. Total K12 is used as the school's POS system. It is a new system this year and nutrition staff were trained to use the system. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records were on file for all meals claimed for reimbursement for the review period. Cashiers appeared to be aware of what constitutes a reimbursable meal.
Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of November 14-18, 2016 for breakfast and lunch at the Elementary. The worksheets showed that students were served all meal components. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the Elementary school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes and the number students are allowed to take of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.
Offer vs. Serve: Offer vs. Serve is being implemented properly. All students observed selected 1/2 cup of fruit and/or vegetable. There is signage at lunch explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.
Water: Free potable water is available to all students for lunch and for breakfast?